

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**DEFENDANT GOOGLE LLC'S UNOPPOSED
MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendant Google LLC respectfully files this motion to seal the unredacted copy of its Answer. Concurrent with this motion, Google has filed a redacted copy of its Answer. Dkt. 67.

The Answer includes Google's responses to allegations that Plaintiffs redacted from their publicly filed Complaint because they reveal certain confidential information of Google and third parties obtained pursuant to Tex. Bus. & Com. Code 15.01 *et seq.* Plaintiffs filed a motion to seal this information, and the Court granted the motion. Dkts. 2-3.

In the interest of protecting its own confidential information and that of third parties, Google seeks leave to file the unredacted copy of its Answer under seal. Granting this motion is consistent with the Court's order sealing the underlying redacted allegations and will continue to protect confidential information produced pursuant to the Texas Antitrust Act.

CONCLUSION

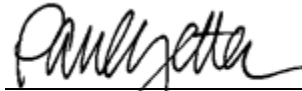
For these reasons, defendant Google respectfully requests that the Court grant Google leave to seal the unredacted copy of its Answer.

Dated: February 22, 2021

John D. Harkrider (*pro hac vice*)
AXINN VELTROP & HARKRIDER, LLP
114 West 47th Street
New York, NY 10036
(212) 728-2210
jharkrider@axinn.com

Daniel S Bitton (*pro hac vice*)
AXINN VELTROP & HARKRIDER, LLP
560 Mission St.
San Francisco, CA 94105
(415) 490-1486
dbitton@axinn.com

Respectfully submitted,



R. Paul Yetter
State Bar No. 22154200
Bryce L. Callahan
State Bar No. 24055248
YETTER COLEMAN LLP
811 Main Street, Suite 4100
Houston, Texas 77002
(713) 632-8000
(713) 632-8002
pyetter@yettercoleman.com
bcallahan@yettercoleman.com

Eric Mahr (*pro hac vice*)
Julie S. Elmer (*pro hac vice*)
FRESHFIELDS BRUCKHAUS DERINGER LLP
700 13th Street NW, 10th Floor
Washington, D.C. 20005
(202) 777-4545
(202) 777-4587
eric.mahr@freshfields.com
Julie.elmer@freshfields.com

ATTORNEYS FOR DEFENDANT
GOOGLE LLC

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7(h), I certify that on February 22, 2021, I conferred by e-mail with Ashley Keller and Zeke DeRose, counsel for the State of Texas, regarding whether plaintiffs oppose this motion. According to Mr. Keller, plaintiffs are unopposed.

/s/ Bryce L. Callahan
Bryce L. Callahan

CERTIFICATE OF SERVICE

I certify that this document was filed electronically in compliance with Local Rule CV-5(a) on February 22, 2021, and was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Bryce L. Callahan
Bryce L. Callahan